

Motion for Summary Judgment Hearing

Petter Investments, Inc. v. Hydro Engineering, Inc.

April 29, 2015

2:14-CV-00045

Topic 1 – “frame”

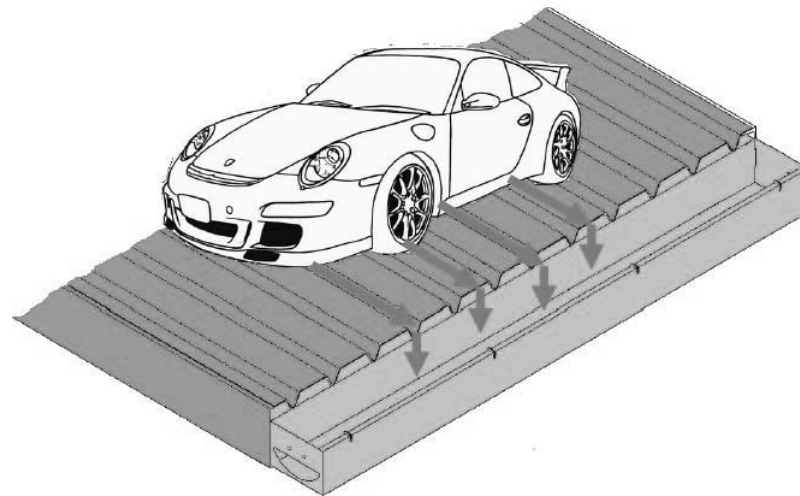
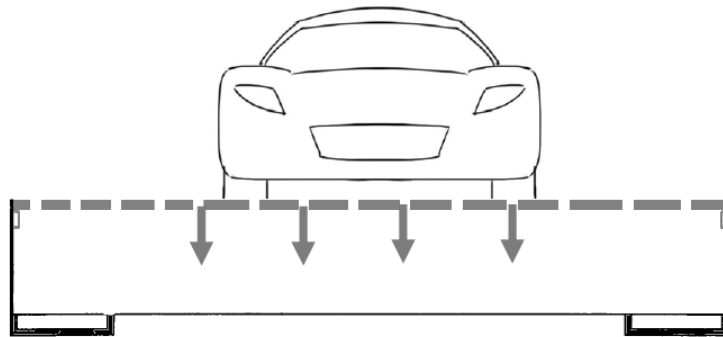
- Hydropad Frame Walls
 - Function, Way, Result of “the walls shown as Element 2”
 - Four identified walls *not* all weight bearing (side gutter)
 - Four identified walls do *not* form a basin with bottom surface
 - Four identified walls do *not* enclose an area filled by the top surface

Topic 2 – “bottom surface”

- Hydropad Impervious Top Channels/Grooves
 - Function /Result
 - Direct water and debris across washing surface to side trough
 - Do *not* collect water and debris
 - Function is substantially different – Noninfringement
 - Way
 - Integral part of the corrugated washing surface
 - Resides *above* the frame walls
 - Does *not* combine with frame walls to define a basin below washing surface
 - Does *not* intersect the bottom portion of the frame walls
 - Way is substantially different – Noninfringement

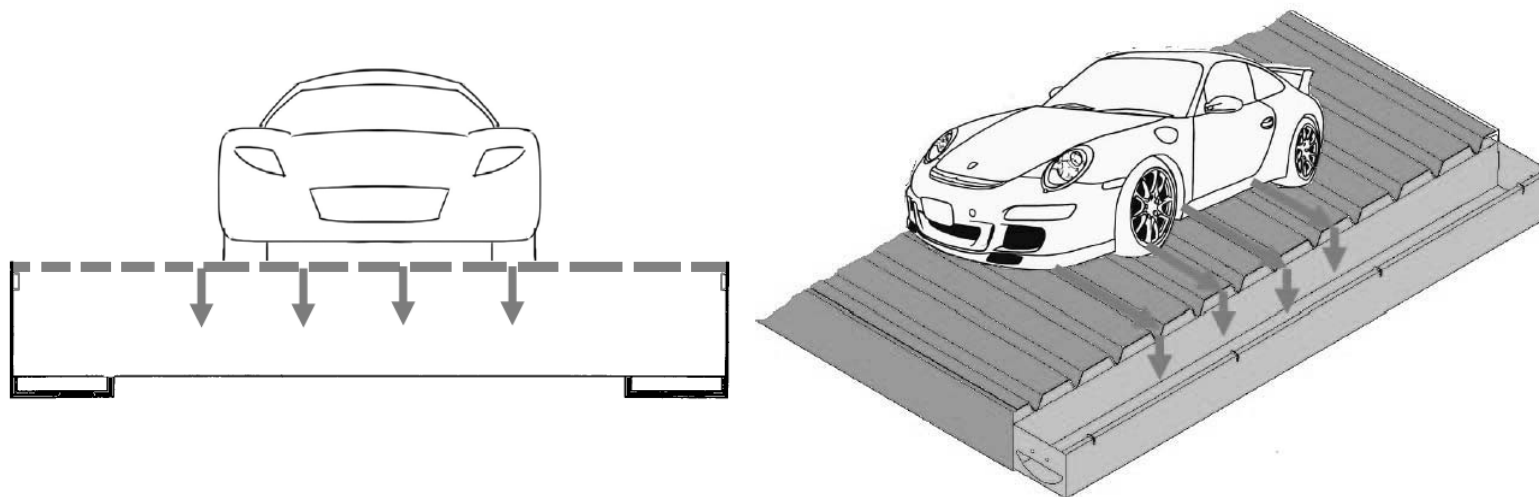
Topic 3 – “grate”

- Hydropad Impervious Top Surface
 - Function/Way
 - Supports vehicle to the *side* of collection trough
 - Does *not* support the vehicle “above” a basin
 - Function and way are substantially different – Noninfringement



Topic 3 – “grate”

- Hydropad Impervious Top Surface
 - Function/Way
 - Directs water/debris *across* wash surface to a side trough
 - Does *not* allow water through into basin below vehicle
 - Function/way are substantially different – Noninfringement



Topic 3 – “grate”

- Hydropad Impervious Top Surface
 - Result
 - Permits clean-out without moving vehicle/wash surface
 - Does *not* allow clean-out during washing process
 - Result is substantially different – Noninfringement

